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May 30th, 2008

Ms. Delores Brown Chief, Office of Environmental Compliance Department of Water Resources P.O. Box 942836 Sacramento. CA 94236

RE: Environmental Impact Report and Environmental Impact Statement for the Sacramento – San Joaquin Bay Delta Conservation Plan

Dear Ms. Brown:

On behalf of Calleguas Municipal Water District (Calleguas), I want to thank you for providing us the opportunity to comment on the development of the Sacramento – San Joaquin Bay Delta Conservation Plan. As the Northern-most member agency of Metropolitan Water District of Southern California, and a wholesale water district which relies 100% on the State Water Project to supply over 600,000 people, Calleguas is keenly interested in the successful development and adoption of a Bay Delta Conservation Plan (BDCP).

Calleguas strongly supports the intent of the BDCP, as stated in the Notice of Preparation of the Environmental Impact Report and Environmental Impact Statement (EIR/EIS), to "secure authorizations that would allow the conservation of covered species, the restoration and protection of water supply reliability, protection of certain drinking water quality parameters and the restoration of ecosystem health to proceed within a stable regulatory framework."

Reliability, Not Increased Exports

First and foremost, Calleguas is interested in assuring its customers a reliable supply of quality, affordable water. When Calleguas formed in 1953 to secure water for Southern Ventura County, imported supplies from the Colorado River, and subsequently from the State Water Project, offered dependability and a quality that the region's overdrafted and unusable groundwater basins could not supply. Today, however, threats to State Water significantly undermine the District's confidence in its imported supply and threaten the District's reliability.

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Seismic risks, increased flooding and sea level rise threaten to disrupt State Water Project deliveries, due to the vulnerability of Delta levees. Additionally, worsening environmental conditions in the Bay-Delta environment require protections for endangered and threaten species that have caused regulatory cut backs in exports, further restricting water supplies. These issues must be addressed in order for the State Water Project to meet its contract obligations.

Currently, Calleguas imports roughly 130,000 acre feet annually from the State Water Project. The District's long-term resource plan, however, is to reduce its imported demand to 100,000 acre feet through investments in conservation, recycling and brackish groundwater recovery. The reliability of this base (100,000 acre feet) supply is more important to Calleguas than maintaining or increasing its current exports.

Operating with the Environment in Mind

A better understanding of aquatic species' life-cycle and migration patterns suggest that state water contractors will need to adjust current pumping cycles to more carefully protect the marine environment. Certain times of the year, pumping may be prohibited or significantly curtailed. In order to provide for both the fish and the public we serve, the State's conveyance system must accommodate these fluctuations. Whether supplies are directed through the Delta or around it, conveyance must be adequately sized to move water safely, responsibly and efficiently, when it's plentiful. Alternatively, when water is scarce, operational criteria must ensure species protection, or water managers run the continued risk of having Judges regulate their water supplies.

Agencies that depend on the State Water Project require certainty in order to effectively plan for the customers they serve. Calleguas encourages the State to move forward with the EIS/EIR on the Bay Delta Conservation Plan, and begin work on a comprehensive program to meet California's water needs in a manner that respects the ecological values of the Delta.

Thank you for your consideration of our comments.

Very truly yours,

Donald R. Kendall, Ph.D., P.E.

General Manager

cc: Calleguas Board of Directors